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**UNITED COMMUNICATIONS CO.**

WAR - 8 2010

**REF:EB DOCKET NO. 06-36**

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# UNITED COMMUNICATIONS CO.

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AUTHORIZED DEALER FOR  
**E.E. JOHNSON**  
RADIO COMMUNICATION  
PRODUCTS

## Annual CPNI Compliance Certification for United Communications Co.

I, Lloyd F. Clark, being of lawful age and duly sworn, on oath state that I am the owner of United Communications Co. I attest that, as the owner of United Communications Co., I am authorized to execute this CPNI Compliance Certification on the company's behalf.

I do, therefore, state the following:

I, Lloyd F. Clark, have personal knowledge that United Communications Co.'s business methods, and the procedures adopted and employed by the company are adequate to ensure compliance with section 222 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("the Act"), and the Federal Communications Commission's regulations implementing Section 222 of the Act, 47 C.F.R. 64.2005, 64.2007 and 64.2009.

Furthermore, I certify that, based upon my personal knowledge of these procedures, my company's personnel are trained on these procedures and that these procedures ensure that the company is in compliance with the rules in Title 47 Telecommunications, Section 64.2001 through 64.2009.

Signature

*Lloyd F. Clark*

Lloyd F. Clark/owner  
United Communications Co.

Executed on:

2-25-10

**Accompanying Statement to  
Annual CPNI Compliance Certification  
United Communications Co.**

In compliance with 47 C.F.R. § 64.2009(e), I, Lloyd F. Clark, acting on behalf of United Communications Co. certify the Company has taken the following actions:

**Employee Training and Discipline**

- Trained all employees and personnel as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI.

**Sales and Marketing Campaign Approval**

- Guaranteed that all sales and marketing campaigns are approved by management.

**Record-Keeping Requirements**

- Established a system to maintain a record of all sales and marketing campaigns that use their customers' CPNI, including marketing campaigns of affiliates\* and independent contractors.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Make certain that these records are maintained for a minimum of one (1) year.

**Establishment of a Supervisory Review Process**

- Established a supervisory review process for all outbound marketing situations.
- Certified that under this review process, all sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.

## **United Communications Co.**

### **Opt-In**

- Guaranteed that the Company only discloses CPNI to agents, affiliates, joint venture partners, independent contractors or to any other third parties only after receiving "opt-in" approval from a customer.
- Verified that the Company enters into confidential agreements with joint venture partners, independent contractors or any other third party when releasing CPNI.

### **Opt-Out Mechanism Failure**

- Established a protocol through which the Company will provide the FCC with written notice within five (5) business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

### **Compliance Certificates**

- Executed a statement, signed by an officer, certifying that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations-
- Executed a statement detailing how operating procedures ensure compliance with CPNI regulations.
- Executed a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

### **Customer Authentication Methods**

- Instituted customer authentication methods to ensure adequate protection of customers' CPNI. These protections only allow CPNI disclosure in accordance with the following methods:

- Disclosure of CPNI information in response to a customer providing a pre-established password;
- Disclosure of requested CPNI to the customer's address or phone number of record; and
- Access to CPNI if a customer presents a valid photo ID at the carrier's retail location.

### **Customer Notification of CPNI Changes**

- Established a system under which a customer is notified of any change to CPNI. This system, at minimum, notifies a customer of CPNI access in the following circumstances:

## United Communications Co

\*password modification,

\*in response to a carrier-designed back-up means of authentication,

\* online account changes, or

\*address of record change or creation.

### Notification to Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ("LEA") is notified of any unauthorized access to a customer's CPNI.
  
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.

**United Communications Co.**

**Summary of Actions  
Taken Against Databrokers**

In compliance with 47 C.F.R. § 64.2009(e), I, Lloyd F. Clark, acting on behalf of, United Communications Co. summarize the actions that the Company has taken against databrokers within the last year:

*Detailed list of "any actions" taken against providers or databrokers.*

*The term "any actions" means: proceedings instituted or petitions filed by a carrier at either state commissions, the court system, or at the Federal Communications Commission against databrokers.*

**No such actions taken against databrokers within the last year**

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Summary of Customer Complaints Received by United Communications Co.

In compliance with 47 C.F.R. § 64.2009(e), I, Lloyd F. Clark, acting on behalf of , United Communications Co., provide a summary of customer complaints received within the last year.

- 1) The Company has received no complaints as a result of improper access by employees.
- 2) The Company has received no complaints as a result of improper disclosure to individuals not authorized to receive the information
- 3) The Company has received no complaints as a result of instances of improper access to online information by individuals not authorized to view the information.
- 4) In addition, the Company is aware of the following processes pretexters are using to attempt to access CPNI, and what steps carriers are taking to protect CPNI: NONE

signed

*Lloyd F. Clark*

Executed on:

2-25-10

*(provide information concerning processes pretexters are using to attempt to access CPNI and what steps carriers are taking to protect CPNI)*